

Remarks

Claims 1-29 are pending. Claims 1-29 stand rejected.

Please cancel claims 20-21, 25, 27, and 29 without prejudice or disclaimer.

The amendments to the claims do not add new and are supported by the specification.

Claims 1-29 were rejected under 35 U.S.C. 102(b) as being anticipated by Bodnar et al. (5,143,945). Applicants respectfully disagree and traverse this rejection for at least the following reasons. To anticipate a claim, a reference must teach every element of the claim. *See MPEP § 2131; Richardson v. Suzuki Motor Co.*, 868 F. 2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Applicants respectfully submit that Bodnar et al. does not teach the blowing agents recited in the current claims, namely, water, a hydrocarbon, a hydrofluorocarbon, or mixtures of any or some of the foregoing. Therefore, Applicants respectfully submit that Bodnar et al. does not anticipate the current claims, and, accordingly, request that this rejection be withdrawn.

Claims 1-29 were rejected under 35 U.S.C. 102(b) as being anticipated by WO 98/20,058. Further, claims 1-29 were rejected under 35 U.S.C. 102(e) as being anticipated by Sieker et al (6,403,665) (corresponding closely with WO 98/20,058). Applicants respectfully disagree and traverse these rejections for at least the following reasons. To anticipate a claim, a reference must teach every element of the claim. *See MPEP § 2131; Richardson v. Suzuki Motor Co.*, 868 F. 2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). “The identical invention must be shown in **as complete detail as contained in the . . . claim.**”).” (emphasis added) *Richardson*, 868 F. 2d at 1236. Applicant respectfully submits that WO 98/20,058 and Sieker et al. do not disclose all the elements recited in the claims *in as complete detail as is contained in the claims*. Applicants respectfully submit that WO 98/20,058 and Sieker et al. do not teach the amount of metal salt trimerisation catalyst as specified in the present claims. Accordingly, Applicants respectfully request that these rejections be withdrawn.

Claims 1-29 were rejected under 35 U.S.C. 102(b) as being anticipated by WO 99/51,668. Further, claims 1-29 were rejected under 35 U.S.C. 102(e) as being anticipated by Rothaker et al. (6,602,927) (corresponding closely with WO 99/51,668). Applicants respectfully disagree and traverse these rejections for at least the following reasons. Applicants respectfully submit that WO

99/51,688 and Rothaker et al. do not disclose an isocyanate-reactive component that comprises at least 30 wt % of polyester polyols as is recited in the current claims. Applicants respectfully submit that WO 99/51,688 and Rothaker et al. primarily contemplate the use of polyether polyols (see column 4, lines 17 – 52 of Rothaker et al.) and do not teach the amount of polyester polyols recited in the current claims. Further, Applicants respectfully submit that WO 99/51,688 and Rothaker et al. are directed to SRIM polyisocyanurate, not to rigid polyisocyanurate foams, as are the instant claims. As such, Applicants respectfully submit that WO 99/51,688 and Rothaker et al. do not anticipate the instant claims, and request that these rejections be withdrawn.

Claims 1-29 were rejected under 35 U.S.C. 102(b) as being anticipated by Hickey (5,922,779) and under 35 U.S.C. 102(e) as being anticipated by Hickey (6,359,022) (CIP of 5,922,779). Applicants respectfully disagree and traverse these rejections for at least the following reasons. To anticipate a claim, a reference must teach every element of the claim. *See MPEP § 2131; Richardson v. Suzuki Motor Co.*, 868 F. 2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). “The identical invention must be shown in **as complete detail as contained in the . . . claim.**”).” (emphasis added) *Richardson*, 868 F. 2d at 1236. Applicants respectfully submit that the Hickey references do not disclose all the elements recited in the claims *in as complete detail as is contained in the claims*. Applicants respectfully submit that neither Hickey reference teaches the use of carboxylic acids in combination with metal salt trimerisation catalysts. While it is noted that Dabco K-15 catalyst is used in the examples, no carboxylic acid is used in combination with the catalyst in these examples. Therefore, Applicants respectfully submit that the Hickey references do not anticipate the instant claims and request that these rejections be withdrawn.

Conclusion

In view of the foregoing remarks, Applicants respectfully submit that the application is now in condition for allowance, and respectfully requests issuance of a Notice of Allowance directed towards claims 1-19, 22-24, 26, and 28. If a telephone conference would expedite the processing of this application, the Examiner is requested to contact the undersigned at (281) 719-4803.

Should any fee be due in connection with the filing of this document, the Commissioner for Patents is hereby authorized to deduct said fee from Huntsman Corporation Deposit Account No. 08-3442.

Please date stamp and return the enclosed postcard to acknowledge receipt of this material.

Respectfully submitted,

A handwritten signature in cursive script that reads "Nicole Pfeffer Graham".

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Date: 2-18-05